

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Brandon M. Grant, Special Agent (SA) with the Federal Bureau of Investigation (FBI) assigned to the Jackson Division, and Victor B. Dickerson, Special Agent (SA) with the United States Secret Service, being duly sworn, state the following:

1. SA Grant is employed by the Federal Bureau of Investigation and has been employed for approximately thirteen years. I am currently assigned to a FBI Counterterrorism squad which includes the Mississippi Joint Terrorism Task Force (JTTF) and, as such, I am charged with enforcing all laws in all jurisdictions of the United States, its territories and possessions. My primary duty and assignment obligates me to apprehend federal criminals. The information contained in this affidavit is based on my personal knowledge and information supplied to me by other law enforcement officers.

2. SA Dickerson is employed by the United States Secret Service and has been for approximately fourteen years. I am currently assigned to the Oxford, MS, Office of the Secret Service. As such, I am charged with the protection of the President of the United States. The information contained in this affidavit is based on my personal knowledge and information supplied by other Law Enforcement Officers.

3. This affidavit is submitted for the limited purpose of supporting a criminal complaint and arrest warrant against PAUL KEVIN CURTIS for a violation of Title 18, United States Code, Section 871, which states in pertinent part:

Whoever knowingly and willfully deposits for conveyance in the mail or for a delivery from any post office or by any letter carrier, any letter, paper, writing,

print, missive or document containing any threat to take the life of, to kidnap, or to inflict bodily harm upon the President of the United States...[shall be guilty of an offense against the United States]; and

Section 876(c) which states in pertinent part and as read in conjunction with Title 18, United States Code Section 876 (a):

Whoever knowingly so deposits or causes to be delivered as aforesaid [by the Postal Service according to the direction thereon], any communication with or without a name or designating mark subscribed thereto, addressed to any other person and containing....any threat to injure the person of the addressee or of another shall be [guilty of an offense against the United States]....

I have not set forth each and every fact known concerning this investigation.

4. On April 16, 2013, the Jackson Division of the FBI was advised that the United States Senate Mail Facility in Landover, Maryland, identified an envelope which contained a type-written letter and a suspicious granular substance. The letter was addressed to "Snator (sic) Roger Wicker, 555 Dirksen Senate Bldng, Washington DC 20510". Senator Wicker is an elected official representing the State of Mississippi whose primary residence is in the Northern District of Mississippi. No return address was identified on the envelope and it was postmarked in Memphis, Tennessee, on April 8, 2013.

5. Contained in the envelope was a letter containing the following language:

No one wanted to listen to me before.
There are still 'Missing Pieces'
Maybe I have your attention now
Even if that means someone must die.
This must stop.
To see a wrong and not expose it,
is to become a silent partner to its continuance
I am KC and I approve this message

6. Field tests conducted on the suspicious granular substance preliminarily provided positive and inconclusive field tests for Ricin. Of the four (4) field tests conducted by the Hazardous Materials Response Team (HMRT), three (3) were positive for a protein, further tests resolved to be Ricin. One (1) field test was inconclusive. Further analysis conducted of the suspicious powder by a member of the LRN in Maryland advised the substance was "highly reactive" by PCR/TRF for Ricin. LRN is an acronym for Laboratory Response Network which is a partnership between the Centers for Disease Control and Prevention, the FBI and the Association of Public Health Laboratories in an effort to ensure an effective laboratory response to bioterrorism by helping to improve the nation's public health laboratory infrastructure, which had limited ability to respond to bioterrorism. Polymerase Chain Reaction (PCR) and Time-Resolved Fluorescence (TRF) are scientific techniques conducted to determine the presence of biological threat agents in a material.

7. Based upon my training and experience, I know that Ricin is a very toxic substance which, if ingested, inhaled, or absorbed, can be fatal. Properly distributed, it could kill numerous people. Ricin poisoning has no known antidote and is extremely difficult to detect as the cause of death.

8. The United States Capitol Police queried Senator Wicker's staff for any constituent with the initials "KC" who previously corresponded with the office. This query revealed a constituent named PAUL KEVIN CURTIS, who previously sent multiple communications to Senator Wicker's office in Washington, DC, containing similar verbiage, "this is KEVIN CURTIS and I approve this message". On September 24, 2010, CURTIS posted on his



blog that he was currently writing a novel about black market body parts that was titled "Missing Pieces." On December 7, 2011, CURTIS sent an e-mail to United States Representative Alan Nunnelee, First Congressional District of Mississippi, that referred to his book "Missing Pieces". Letters to the President [discussed infra], Senator Wicker and a letter to Lee County Mississippi Justice Court Judge Sadie Holland [discussed infra] also make reference to "Missing Pieces."

9. On April 17, 2013, the Jackson Division of the FBI was advised that Sadie Holland, a Justice Court Judge in Lee County, Mississippi, had received a letter on or about April 10, 2013, delivered by the U. S. Postal Service, meeting the same description. The letter was addressed to Sadie Holland at her office in Tupelo, Mississippi. No return address was identified on the envelope and it was postmarked in Memphis, Tennessee, on April 8, 2013.

10. Contained in the envelope was a letter containing the following language:

No one wanted to listen to me before.
There are still 'Missing Pieces'
Maybe I have your attention now
Even if that means someone must die.
This must stop.
To see a wrong and not expose it,
is to become a silent partner to its continuance
I am KC and I approve this message

11. The envelope which contained the above type-written letter also contained a suspicious granular substance. Although the substance has not yet been tested, comparison of the photographs of the letters to the President and Senator Wicker reveal it to be a similar substance as contained with the letter addressed to the President and Senator Wicker.

12. Additionally, on April 16, 2013, an envelope was identified addressed to United States President Barack Hussein Obama, the White Hours, 1600 Pennsylvania Avenue N.W., Washington, DC, 20500 containing the same letter and suspicious granular substance. The suspicious granular substance preliminarily field tested as positive for Ricin. No return address was identified on the envelope and the envelope was postmarked in Memphis, Tennessee, on April 8, 2013. The verbiage in the letter is exactly the same as detailed in Paragraphs 5 and 10 above. All three (3) letters contained the same verbiage, font, style and paper color (yellow).

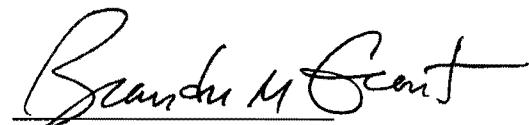
13. Based upon information received from inspectors with the United States Postal Service, letters deposited into the United States Mail in most, if not all, of the northern counties in the State of Mississippi, including Lee County, will bear a Memphis, Tennessee, post mark unless the depositor requests otherwise.

14. In addition, on April 12, 2013, CURTIS posted a photograph on his Facebook page and under the comments for the picture, he included the quote "To see a wrong and not expose it, is to become a silent partner to its continuance." On his Facebook page, Curtis refers to himself as "KC". The above described letters contained the following quote, "To see a wrong and not expose it is to become a silent partner to its continuance."

15. Contact with Booneville (Mississippi) Police Department Sergeant Corrie Robbins revealed CURTIS has been investigated on several occasions since 2007. In 2007, CURTIS' ex-wife reported to the Booneville Police Department that CURTIS was extremely delusional, anti-government, and felt the government was spying on him with drones.

16. Based on the facts set forth above, the affiants would submit that there is probable cause to believe that about on or about April 8, 2013 and continuing until on or about April 17, 2013, in the Northern District of Mississippi and elsewhere, PAUL KEVIN CURTIS did knowingly and willfully deposit for conveyance in the mail or for a delivery from any post office or by any letter carrier, any letter, paper, writing, print, missive or document containing any threat to take the life of or to inflict bodily harm upon the President of the United States, in violation of Title 18, United States Code, Section 871. There is also probable cause to believe that from on or about April 8, 2013 and continuing until on or about April 17, 2013, in the Northern District of Mississippi and elsewhere, PAUL KEVIN CURTIS, did knowingly deposit and cause to be delivered by the Postal Service according to the directions thereon, communications addressed to any other person, and containing....a threat to injure the person of the addressees or another....., in violation of Title 18, United States Code, Section 876(c), read in conjunction with Title 18, United States Code, Section 876(a)

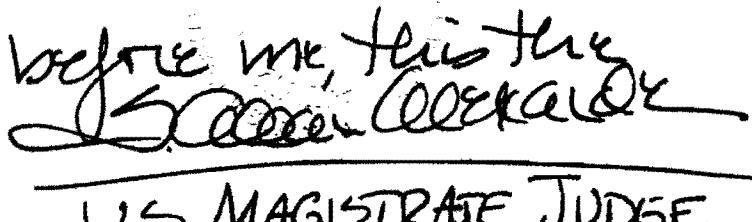
17. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief, and that this declaration was executed on April 17, 2013.



Brandon M. Grant, Special Agent
Federal Bureau of Investigation



Victor B. Dickerson
United States Secret Service

Sworn to and subscribed before me, this the
17th of April, 2013. 

U.S. MAGISTRATE JUDGE

